

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

Diane Tinkle

IN RE:	Gerald R. Galleshaw	:	
	Debtor	:	
		:	
DAVID C. FRAIOLI and NEW		:	
ENGLAND AUTO CENTER, INC.		:	
	Plaintiffs	:	CASE NO: 15-11047
		:	
V.		:	CHAPTER 7
		:	
GERALD R. GALLESASHAW,		:	ADV. PRO. NO.: 15-01023
Defendant		:	

MOTION TO EXTEND TIME TO FILE MEMORANDUM OF LAW

Now comes Plaintiffs, David C. Fraioli and New England Auto Center, Inc. (collectively “Plaintiff”), by its counsel, hereby moves this honorable Court to allow a brief extension of time to file a memorandum of law in support of Plaintiffs’ Objection to Defendant, Gerald R. Galleshaw’s Application for Entry of Default and Motion for Default Judgment in accordance to the Order that was entered by this Court on May 11, 2016. Plaintiff respectfully requests an extension of time up to and including May 26, 2016.

Wherefore, Plaintiff respectfully request that a brief extension of time up to May 26, 2016, or a time that is convenient with this Court, be granted to allow Plaintiff to file a memorandum of law in support of its Objection.

David C. Fraioli and
New England Auto Center, Inc.

By its Attorneys,

/s/ Ryanna T. Capalbo, Esq.
Andrew R. Bilodeau, Esq. #7174
Ryanna T. Capalbo, Esq. #8314
Bilodeau Capalbo, LLC
51 Jefferson Blvd, Suite 2
Warwick, RI 02888
Tel: 401.461.7700
Fax: 401.633.7511

Dated: May 19, 2016

CERTIFICATION

I hereby certify that on the 19th day of May, 2016, I electronically filed a true and accurate copy of the within document to be sent via electronic means with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System and via email to the following:

Todd Dion, Esq.
Law Office of Todd S. Dion
1599 Smith Street
North Providence, RI 02911

/s/ Ryanna T. Capalbo, Esq.
Ryanna T. Capalbo, Esq., #8314